

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CAMPUS STORES OF MASS., INC.,	)	
	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 05-11116 NG
	)	
FOLLETT HIGHER EDUCATION	)	
GROUP, INC.,	)	
	)	
Defendant.	)	
	)	

**FOLLETT HIGHER EDUCATION GROUP, INC.’S MOTION FOR LEAVE TO FILE  
REPLY TO PLAINTIFF’S OPPOSITION TO *REVISED* MOTION FOR  
CLARIFICATION AND/OR RECONSIDERATION OF PRELIMINARY INJUNCTION  
AND, ALTERNATIVELY, FOR STAY PENDING APPEAL**

Defendant Follett Higher Education Group, Inc. (“Follett”) hereby moves, pursuant to LR 7.1(B)(3), for leave to file the accompanying reply to the opposition to Follett’s Revised Motion for Clarification and/or Reconsideration of Preliminary Injunction and, Alternatively, for Stay Pending Appeal (“Motion for Clarification”) filed by plaintiff, Campus Stores of Mass., Inc. (“Campus Stores”)(“Opposition”). As grounds therefor, the reply is necessary to respond to the numerous spurious and inflammatory allegations, as well as the series of misleading representations regarding the history of this case, that Campus Stores included in its Opposition in an obvious attempt to discredit Follett and to distract the Court from consideration of the issues that are relevant to the Motion for Clarification. In particular, the reply is necessary to respond to Campus Stores’ outrageous and unfounded assertions that Follett engaged in “concealment,” “intentional deception of the Court” and “completely disregarded its duty of candor to this tribunal.”

Respectfully submitted,

FOLLETT HIGHER EDUCATION GROUP, INC.

By its attorneys,

/s/ Mark Berthiaume

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